

FILED

JUN 15 2023

**CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS**

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

v.

TERRY O'NEIL WILLIAMS, JR.

§
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§
§
§

No. 4:23-CR- 149
Judge Jordan

INDICTMENT

The United States Grand Jury Charges:

COUNT ONE

Violation: 18 U.S.C. § 922(a)(1)(A)
(Engaging in the Business Without
a License (Firearms))

Beginning in and around 2020 and continuing through May of 2023, in the Eastern District of Texas and elsewhere, the defendant, TERRY O'NEIL WILLIAMS, JR., not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of 18 U.S.C. §§ 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT TWO

Violation: 18 U.S.C. § 922(a)(6)
(Acquire a Firearm from a Licensed
Dealer by False or Fictitious Statement)

On or about April 28, 2022, in the Eastern District of Texas, TERRY O'NEIL WILLIAMS, JR., defendant, in connection with the acquisition of a firearm, to wit: a Palmetto State Armory Dagger Compact, 9mm pistol bearing serial number FG05151

and a Glock Inc. Model 42, .380 caliber pistol bearing serial numberAGNV711, from Mister Guns, a licensed dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement that was intended and likely to deceive Mister Guns as to a fact material to the lawfulness of such sale of the said firearm to the defendant.

In violation of 18 U.S.C. §§ 922(a)(6) and 924(a)(2).

COUNT THREE

Violation: 18 U.S.C. § 922(g)(3)
(Possession of a Firearm by a
User of a Controlled Substance)

On or about March 13, 2023, in the Eastern District of Texas, TERRY O'NEIL WILLIAMS, JR. defendant, knowing that he was an unlawful user of a controlled substance as defined in Title 21 United States Code, Section 802, did knowingly possess a firearm, that is, a Glock Inc., Model 44, .22 caliber pistol, bearing serial number ADUV508, said firearm having been shipped and transported in interstate and foreign commerce.

In violation of 18 U.S.C. § 922(g)(3) and 924(a)(8).

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

Criminal Forfeiture Pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

As a result of committing the felony offense alleged in Count One of this Indictment, defendant, TERRY O'NEIL WILLIAMS, JR., shall forfeit to the United

States, pursuant to 18 U.S.C. § 924(d), and 28 U.S.C § 2461(c), **all** firearms and ammunition involved in the offense, including but not limited to the following:

1. a Maverick Arms, Model 88, 12-gauge shotgun bearing serial number MV0925067
2. a Glock GMBH, Model 23, .40 caliber pistol bearing serial number BWWN484
3. a ROMARM/CUGIR, Model Micro Draco, .762x 39 caliber pistol bearing serial number 22PG-7210
4. a Taurus., Model PT111G2A, 9mm caliber pistol bearing serial number ADA878834
5. a Glock GHMB, Model 19GEN5, 9mm caliber pistol bearing serial number BNTZX718
6. a Glock GHMB, Model 30GEN4, 9mm caliber pistol bearing serial number BPMF125
7. a Glock Inc., Model 23C, .40 caliber pistol bearing serial number ABKK664
8. an Aero Precision., Model X15, .5.5 caliber rifle bearing serial number X188771
9. a Glock GHMB, Model 23GEN5, .40 caliber pistol bearing serial number BTEU143
10. a Glock GHMB, Model 43X, 9mm caliber pistol bearing serial number BNAW278
11. a Smith & Wesson, Model M&P, 9mm caliber pistol bearing serial number DWZ1333

12. a Smith & Wesson, Model SD\$0VE, .40 caliber pistol bearing serial number
FXB4506

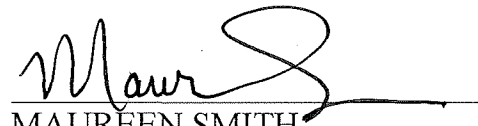
Respectfully Submitted,

A TRUE BILL



GRAND JURY FOREPERSON

DAMIEN M. DIGGS
UNITED STATES ATTORNEY



MAUREEN SMITH
Assistant United States Attorney

Date: 6/15/2023

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NOTICE OF PENALTY

Count One

Violation: 18 U.S.C. § 922(a)(1)(A)

Penalty: Imprisonment of not more than five years, a fine not to exceed \$250,000, or both; a term of supervised release of not more than three years.

Special Assessment: \$ 100.00

Count Two

Violation: 18 U.S.C. §§ 922(a)(6) & 2

Penalty: Imprisonment of not more than ten (10) years, a fine not to exceed \$250,000, or both. A term of supervised release of not more than three (3) years.

Special Assessment: \$100.00

Count Three

Violation: 18 U.S.C. § 922(g)(3)

Penalty: Imprisonment for not more than 10 years, a fine not to exceed \$250,000, or both, and a term of supervised release of not more than three (3) years.

Special Assessment: \$100.00